

UNITED STATES DISTRICT COURT
Eastern District of Massachusetts

Heather Kiernan,
 plaintiff

DOCKET NO.
1:04CV10131- RBC

V.

Armored Motor Service
of America, Inc., and
Francesco Ciambriello,
 defendants

OBJECTION

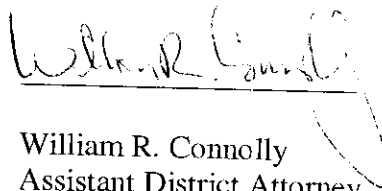
Pursuant to F. R. Civ. P. 45(c)(2) (B), the Office of the Bristol County District Attorney hereby objects to the inspection and copying of the following documents to the extent that they are included within the documents requested in paragraphs 1 (d),(e) of plaintiff's deposition subpoena duces tecum. The objection is on the basis that said documents are privileged under the governmental or deliberative privilege, and are work product, as more fully set forth in the Memorandum of Law in Support of Motion for Protective Order.

DOCUMENT LOG

1. One page document, undated, of former Assistant District Attorney Christopher Abreu regarding comments about tapes;
2. Two page document, undated, of former Assistant District Attorney Jeanne Veenstra's notes for direct examination of proposed witness at the hearing on a motion to dismiss, former Assistant District Attorney Christopher Saunders;

3. One page document, undated, of former Assistant District Attorney Jeanne Veenstra's notes for direct examination of witness at the hearing on a motion to dismiss, Assistant District Attorney Christopher Markey;
4. One page document, undated, of former Assistant District Attorney Jeanne Veenstra's notes preparatory for the hearing on a motion to dismiss;
5. One page intra-office e-mail document, dated June 13, 2002 and June 17, 2002 among former ADA Jeanne Veenstra, ADA Markey, former ADA Abreu regarding missing tapes;
6. One page intra-office e-mail document, dated May 13, 2003 among former ADA Jeanne Veenstra and Victim Witness Advocate, Jamie Mascarello regarding conversation with plaintiff.
7. One page computer printout, undated, of former ADA Veenstra of trial summary.

Respectfully submitted,
Office of the Bristol County
District Attorney,

A handwritten signature in dark ink, appearing to read "William R. Connolly", is written over a horizontal line. The signature is fluid and cursive.

William R. Connolly
Assistant District Attorney
Bristol District